

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

SUSAN RATTNER,

Plaintiff/Counterclaim
Defendant,

v.

CHUBB NATIONAL INSURANCE
COMPANY,

Defendant/Counterclaim
Plaintiff.

Case No.: 1:17-cv-00136-LMB-MSN

PLAINTIFF'S PROPOSED VOIR DIRE

Dr. Susan Rattner, by counsel, respectfully requests that the Court ask all prospective jurors the attached questions during the course of its Voir Dire examination.

Dated: October 3, 2017

Respectfully submitted,

SUSAN RATTNER
By Counsel

/s/ Mark W. Wasserman

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Mark W. Wasserman (VSB No. 22638)

Nicholas V. Albu (VSB No. 78229)

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PLAINTIFF'S PROPOSED VOIR DIRE

1. Where do you live? In what County do you reside? How long have you lived there?
2. Describe your educational background.
3. Have you, or has any member of your family, ever been employed by or applied for employment with Chubb National Insurance Company or Chubb Ltd.? If so, please describe.
4. Have you, or has any member of your family, ever been employed by or applied for employment with any other insurance company? If so, please describe.
5. Have you, or has any member of your family, ever been employed by or applied for employment with an insurance broker? If so, please describe.
6. Have you ever purchased insurance from Chubb National Insurance Company or had any business or personal relationship with Chubb National Insurance Company or Chubb Ltd.?
7. Do you know, or are you familiar with, Susan Rattner?
8. Do you have any prior knowledge of this lawsuit or the events giving rise to this lawsuit?
9. Have you, or has any member of your family or any friend or acquaintance of yours, ever submitted a claim to an insurance company? If so, what were the circumstances? How was the matter ultimately resolved?
10. Have you, or have any members of your family or personal acquaintances, ever experienced a home fire? If yes, please describe the circumstances, including the extent of any damage, whether anyone was injured or killed by the fire, and whether a claim made to an insurance company and the outcome of that claim.

11. Have you, or has any member of your family or any friend or acquaintance of yours, ever worked for or volunteered for a fire department? If so, please describe.

12. Have you, or has any member of your family or any friend or acquaintance of yours, ever worked as a fire investigator? If so, please describe.

13. Have you, or has any member of your family or any friend or acquaintance of yours, ever worked for law enforcement? If so, please describe.

14. Have you, or has any member of your family or any friend or acquaintance of yours, ever worked for a phone company or cell phone company? If so, please describe.

15. Do you have any strong feelings, either positive or negative, about individuals who live on disability income?

16. Do you have any strong feelings, either positive or negative, about individuals who are wealthy?

17. Do you believe that people who are wealthy are less deserving of compensation in a lawsuit than people who are not wealthy?

18. Would you be able to award the Plaintiff \$10 million in damages if that is what the evidence shows she is entitled to?

19. Can you think of anything in your own life that reminds you of this case? If so, please describe.

20. Have you, or has any member of your family or any person close to you, ever been falsely accused of a crime beyond a traffic violation? If so, please explain?

21. Have you ever been a plaintiff or defendant in a lawsuit? If so, please explain?

22. Have you ever been a defendant in a criminal action? If so, please explain?

23. Have you ever served as a juror or witness in a legal proceeding? If so, in what court and what was the nature of the case? What was the outcome?

24. Do you have any legal training?

25. Do you know any of the people who may be called as witnesses by the parties?

26. Do you know, or are you familiar with, any of the attorneys or law firms representing the parties in this case?

27. Do you know, or are you familiar with, the Judge presiding over this case?

28. Do you have any present feeling, for or against any of the parties, attorneys, or witnesses in this matter?

29. Do you have any problems with vision or hearing, or any other condition that may affect your ability to sit as a juror in this case?

30. Do you know of any reason that you would not be able to be a completely fair and impartial juror in this case?

31. Is there anything that hasn't been asked that you think the parties should know?

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of October, 2017, the foregoing has been electronically filed with the Court's CM/ECF filing system, which will then send a notification of such filing to the following:

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